

**UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FILED  
CLERKS OFFICE

Albert William Bleau Jr.

2006 FEB -7 A 10:11

Plaintiff

DISTRICT COURT  
DISTRICT OF MASS.

Vs.

Civil Action  
No. 04 – 10469REK

Greater Lynn Mental Health  
& Retardation Association, et al,

Defendants

**Plaintiff's Additional Proposal For Settlement Pursuant  
To Federal Rules Of Civil Procedure**

Plaintiff Albert W. Bleau Jr. respectfully presents additional proposals for Settlement in addition to those presented in the Joint Discovery Motion of February 3, 2006.

1. The plaintiff has attached a summary of additional accomplishments that should be included in any newsletter agreed to in the settlement and should be attached to any letter agreed to in the settlement that would be mailed to former and present employees, friends of the association, parents and state agencies.
2. GLMHRA should be required to hire an independent consultant to review all consent decree client ISP's to assure that they are receiving adequate services with specific emphasis placed on daily nursing care, occupational therapy, speech therapy, physical therapy, recreational services, dietary services, staff training and psychological consultation as required and needed using the ICF MR standards presently applied in our state operated ICF-MR facilities and homes.
3. The independent consultant should investigate the deaths of all consent

decree clients since January 1, 2000 to determine if there was any violation of ICF MR rules and regulations focusing on the aforementioned areas of care and consultation.

4. GLMHRA should be required to hire an independent nationally certified appraiser and a Real estate Broker to determine if real estate transactions of EMHC, GLMHRA and Bridgewell, Inc. conducted since January 1, 2000 were "arms length", market based transactions for the benefit of the corporations and complied with IRS rules and regulations and state and federal non- profit and purchasing regulations.

Respectfully submitted,



Albert W. Bleau Jr.  
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Swampscott, MA 01907  
(781) 962-2662

Dated: February 7, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on February 7, 2006.



Albert W. Bleau Jr.